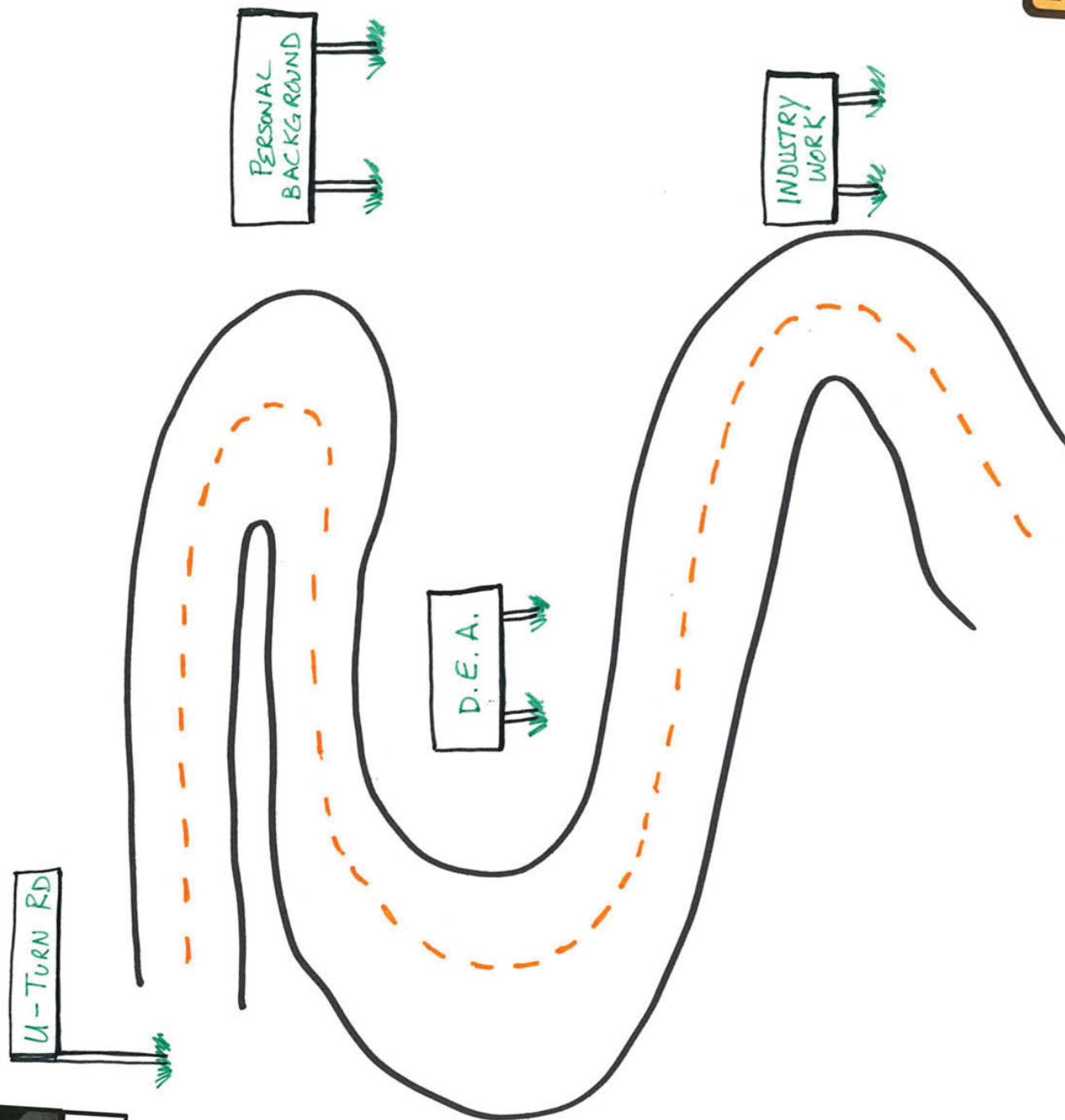
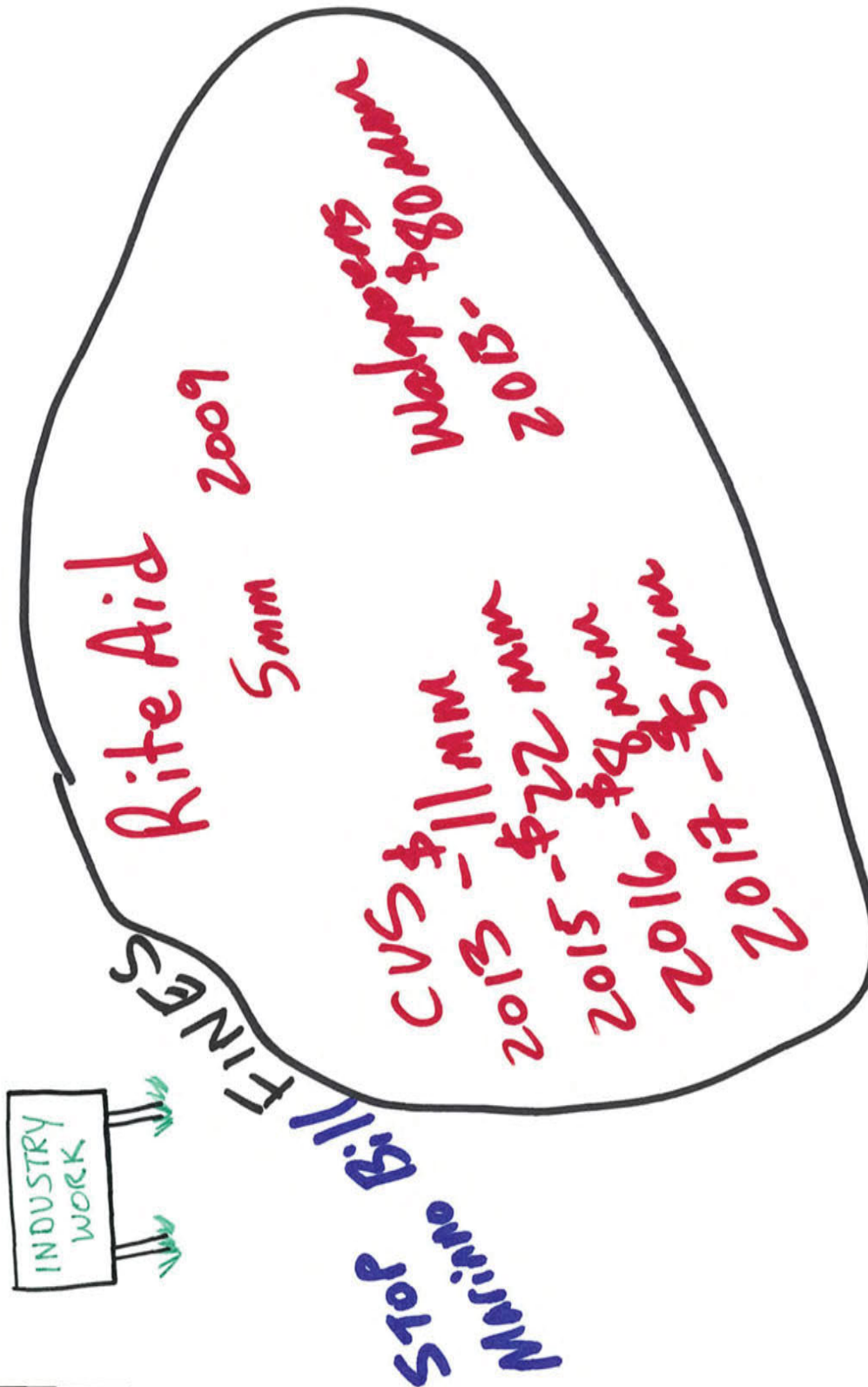


EXHIBIT 9





AMERISOURCE BERGEN

DETERMINING SUSPICIOUS ORDERS
IS SUBJECTIVE

→ This is a reason to
be hyper vigilant, true?

TRUE

→ This is the LEGAL RESPONSIBI-
LITY OF THE DISTRIBUTOR
true?

TRUE

DEA may answer a specific question about whether part of a system is appropriate, the DEA will give its opinion

DEA doesn't do legal work for industry. TRUE?
TRUE

Industry is required to interpret & follow the law
TRUE?
TRUE

Amerisource Bergen

"In the course of your role as a diversion investigator and a group supervisor, you accepted these excessive purchase reports as compliant w/ the Controlled Substances Act?" YES

BUT AFTER THE FACT reporting of suspicious orders has NEVER been in compliance w/ federal law according to the DEA's guidance provided to registrants

True? TRUE

MCKESSON

Distributors can't control
what happens to pills
once the pills are delivered
to the customer of the
pharmacy

But lots of controls
BEFORE that **TRUE**

MCKESSON

Other causes of opioid crisis (e.g. illegal prescribing).

A good Suspicious Order Monitoring system can help catch that
true? TRUE

MCKESSON

Req of 1301.74A is
"only to see if
customer is registered."

But that's not the
only section that
applies to registrants

MCKESSON

DOES \$ 1501.74 say
distributors can't ship
suspicious orders?

What's most important,
health & safety or
company profits?

Plus other sources
re-inforce no shipping



Walmart lawyer asked about
rogue internet pharmacies
as the "greatest threat
of diversion."

Internet pharmacies shut down
by ~2009 BUT problem
continued...



Did Joe Rannazzisi or DEA
Share the ARCOs data w/ companies?

Each ~~Company~~
has data

- The Companies won't agree to sharing **NEVER SEEN agree**
- The DOJ won't agree to share
- Each company has their own data
- Enforcement always comes from a company's own data **YES w/ other sources**



"THE DEA CAN USE HIDDEN
ROOM BUGS"

- WALMART SELLS HIDDEN
ROOM BUGS!
- WALMART HIDES CAMERAS
- WALMART HAS SECURITY
FORCES TRAINED TO PICK
UP & STOP SHOPLIFTERS

WALMART

"THE DEA CAN USE
UNDERCOVER FOLKS"

- Walmart  CAN TOO!

- "Mystery shoppers"



LOTS OF DEA TOOLS
FOR FIGHTING DIVERSION

- WALMART CAN SEE IN REAL TIME AN EXCESSIVE FLOOD OF PILLS SHOULD BE THAT'S A VALUABLE TOOL?

YES



"DEA CAN GET A SEARCH WARRANT"

- DOES WALMART NEED A SEARCH WARRANT TO LOOK IN ITS OWN CLOSET? NO

- DOES WALMART NEED A GRAND JURY?

NO

- A subpoena?

NO

- The FBI?

NO



IF THEY ARE BLAMING
THE DEA FOR NOT
DISCLOSING THEIR INFORMANTS
& OTHER SOURCES-

DOES THAT EXCUSE
WALMART FOR BREAKING
THE LAW?
NO


Walmart



"You're not aware of any deadline that DEA set that changed this practice related to shipping of the suspicious orders"

1983
1970's

DEA NEVER TOLD COMPANIES
TO SHIP SUSPICIOUS OR EXCESSIVE
ORDERS — THAT WAS
THE COMPANY'S DECISION
TRUE? TRUE

Walmart  "WOULD YOU AGREE THAT
DRUG TRAFFICKERS & DIVERTERS
ARE THE ONES WHO POTENTIALLY
BENEFIT IF DEA DECIDES TO
ISOLATE ITSELF FROM INDIVIDUALS
WHO HELP ADVANCE DEA'S DIVERSION
INVESTIGATIONS WHO ARE OUTSIDE OF DEA?"

- Drug "traffickers" are the sellers of opioids - the Walgreens, etc. make \$ off the sales

"Do you agree that good
leaders hold themselves
accountable for the decisions
they make?"

THAT SHOULD BE TRUE
FOR WALMART TOO

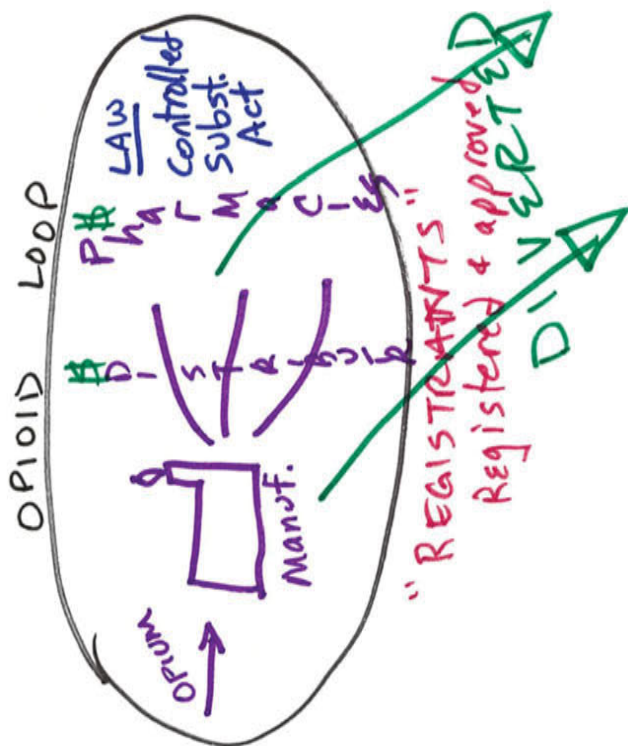
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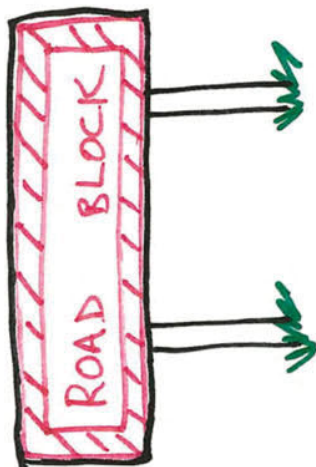
WALMART:

"Do you agree the American public has a right to expect that the leaders of our law enforcement agencies will lead their teams in a fashion consistent with the standards ... "

Do you agree the American public has a right to expect that the leaders of huge companies like Walmart will lead their teams to follow the law, and not try to get away with ~~actions~~ ^{red} that endanger our communities & people.







"DISTRIBUTORS/MAN./PHAR"
WERE CONFUSED

— COMPANIES HAVE

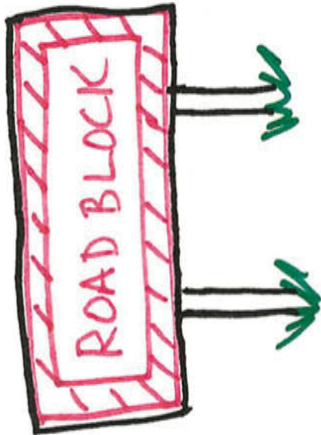
IN-HOUSE &
OUTSIDE LAWYERS

Agree

Agree — DEA doesn't give
legal counsel

Agree — Some companies hired
former employees
from DEA

Agree — If confused, stop selling
until questions answered



Acting Admin
ROSENBERG

"DEA is part of
the problem"

— Disagree. DEA tried
to stop diversion
& clean up supply
chain

— If companies stop
diversion — DEA is or
isn't the issue?



Joseph
Rannazzisi

2005: SAT W/ DISTRIBUTORS
& EXPLAINED LAW &
WHAT WAS EXPECTED

- Don't know
if there

2006: SENT LETTERS
2007:

REMEMBER
RESPONSIBILITIES

KNOW

BUT COMPANIES DIDN'T
DO WHAT DIRECTED
TO DO
THEY DIDN'T COMPLY
COMPANIES CHANGED LAW

KNOW
CONTING
ISSUES

was changed

DIVERSION CAUSES OVERDOSES
& DEATHS - 16,000 in
2014 or 2015

- Don't know
font #'s

"CLOSED SYSTEM OF DISTRIBUTION" Agree

ACCOUNTS FOR DRUG FROM MANUFACTURE TO PATIENT Agree

THE SYSTEM IS FOR LEGAL OBLIGATION TO SECURE, KEEP TO RECORDS, & CONTROL AGAINST DIVERSION Agree

MANUFACTURERS (with a box containing a dollar sign)

DISTRIBUTORS (MIDDLE MAN) (with a box containing a dollar sign and the word "ORDERS")

RETAILERS (with a box containing "Rx")

Agree "BRIDGE"

Agree "Key Component"

Agree "MUST BE VIGILANT"

Agree "CRITICAL"

MORE SOLD - MORE MONEY MADE

due diligence customers know @ susp. orders look



WHAT COMPLIANCE REQUIRED?

for All
to be
Agree

REGISTRANTS TO MAINTAIN
EFFECTIVE CONTROL AGAINST
DIVERSION

- REGISTRANT REQ'D TO
REPORT A SUSPICIOUS
ORDER TO DEA

Agree

- MAINTAIN SYSTEM TO DETECT
SUSPICIOUS ORDERS

Agree

- BUSINESS DECISION BUT
MUST IDENTIFY SUSPICIOUS

Agree

- DON'T SHIP SUSPICIOUS ORDERS
W/O FULL DUE DILIGENCE
RESOLVED SUSPICIONS

Agree

DIVERSION CONTROL 101

IF COMPANY SEES
SUSPICIOUS ORDER:

☐ SHIP/SELL?

or

☐ HOLD &
INVESTIGATE

HOLDING SHIPMENTS THAT
WERE SUSPICIOUS WAS
NEW FOR AMERISOURCE IN
2007

BEFORE THAT, THEY WOULD
BE SUSPICIOUS & SHIP

ANYWAY?

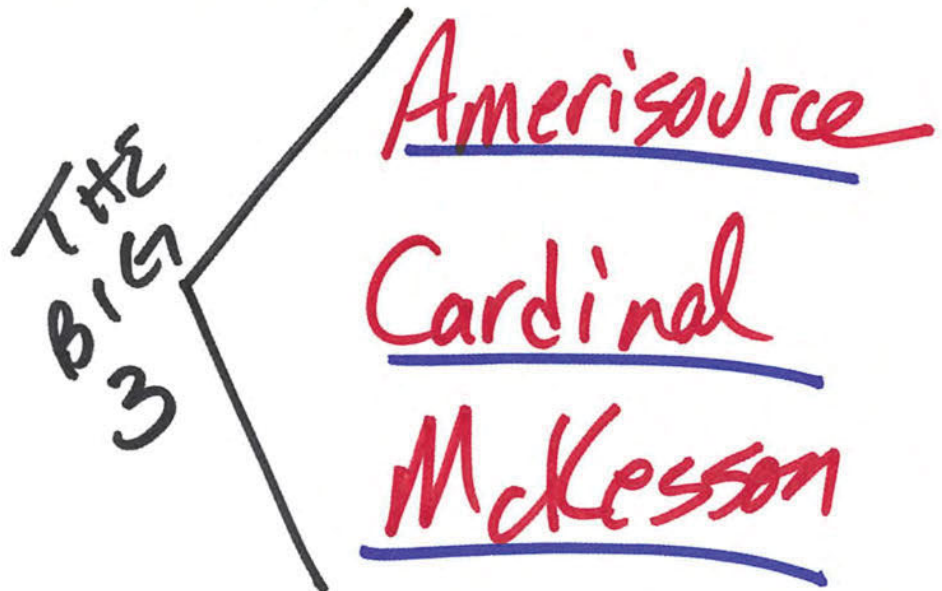
Hold orders?
HOLD
SUSP.
SINCE
1943

We have our suspicions
But we sell
anyway

NOTES ON DISTRIBUTOR MEETINGS (Ex 18)

It says you met w/
the volume/source
problems first.

Who did you
prioritize?



Internet Pharmacies & CARDINAL HEALTH

- MET w/ DEA
- NEVER CONFESSED
- ~~EA~~ Selling pills
any way

MEETING w/ McKesson RE
Internet pharmacies

- McKesson was participating
in this problem too

true? TRUE

SEE THE WHOLE TRUTH

- WOULD NOTE IF "MORE
SAID" AT Mtgs -

So no distributor
"confessed"?

TRUE

Amerisource
lawyer:

"WE'VE NEVER MET BEFORE"

BUT YOU SURE MET HER
CLIENT- Amerisource
Bergan. TRUE?

TRUE

You do privileged work
for them, right?

YES (did)

WORKING for lawyers

Amerisource Bergen mtg re
Internet pharmacies (ex 7)

THIS SHOWS THE GLARING
PROBLEMS W/ Amerisource's
business

True? TRUE 1/3^d

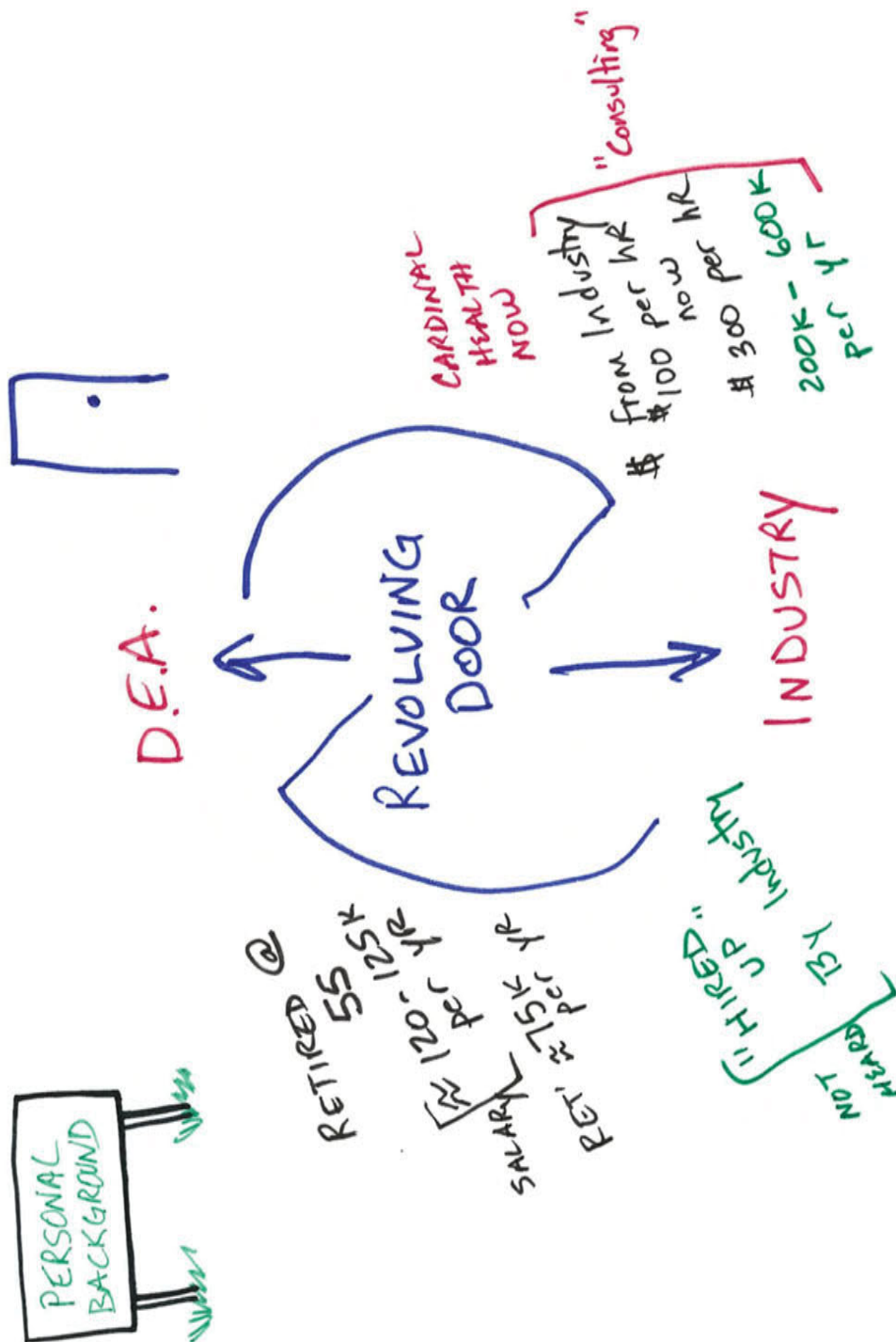
SEE THE WHOLE TRUTH

INTERNET PHARMACY ISSUES

- THIS WAS A HUGE PROBLEM
true? YES
- WHERE DID THEY GET DRUGS?
"DISTRIBUTORS"
- Did the major distributors bring
the problem to the DEA's
attention?
-NO-
- AREN'T DISTRIBUTORS required
to "know their customers"?
DIVERSION
CONTROL
101 YES

INTERNET PHARMACY CONCERNS

- THE LAW IS THE LAW IS THE LAW
SAME LAW TO ALL PHARM.
- THERE IS NO SPECIAL LAW FOR
INTERNET PHARMACIES TRUE
- HOW DO "ROGUE INTERNET
PHARMACIES" GET PILLS?
DISTRIBUTORS
- ARE WE TO BELIEVE Amerisource
Bergon / Cardinal / McKesson
can't figure out a fake pharmacy?
"ignorance is no excuse"

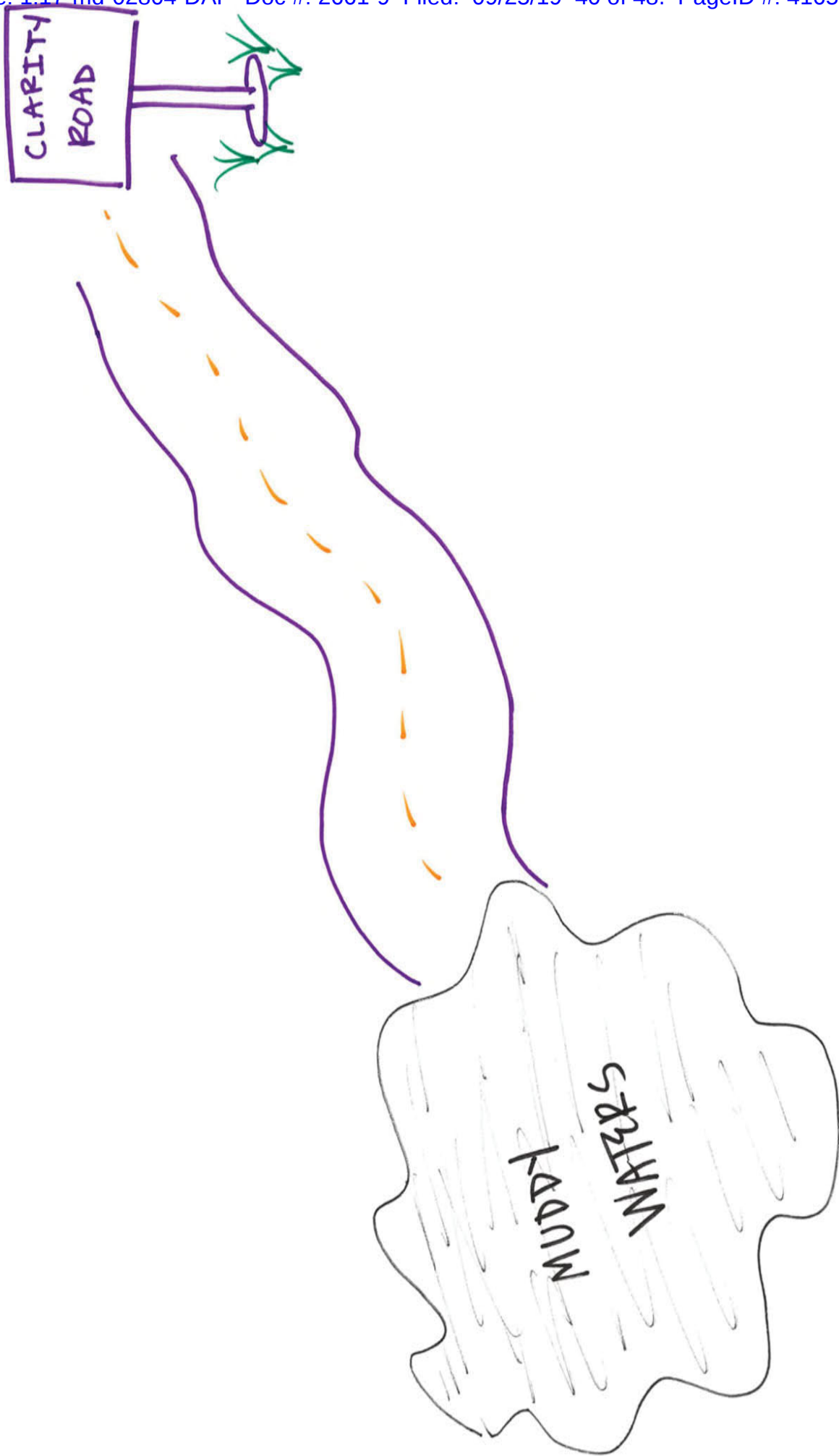


AMERISOURCE BERGEN

THE LAWYER TOLD YOU THE
DEA APPROVED THEIR SUSPICIOUS
ORDER MONITORING SYSTEM AT
ONE POINT IN TIME

- APPROVED METHOD OF PROVIDING INFO
(EX 5)
- THIS WAS METHAMPHETAMINES, NOT
OPIOIDS
- AND THEY HOLD SHIPPING WHILE
CONTACTING & REPORTING TO DEA

RE-DIRECT ROAD MAP



ABDC'S LAWYER
SAID "GRADUAL
CHANGE"

DID THE QUESTIONS
THE ABDC LAWYER
ASKED YOU CHANGE
ANYTHING AB YOUR
TESTIMONY TODAY
THE THIS HAS ALWAYS
BEEN THE LAW
SINCE 1970'S

INTERNET PHARMACY GOT REGISTRATION

- BLAME DEA/GOV -

-
- Δ HAVE DUTY TO
 - KNOW THEIR CUSTOMERS
DEA ~~sample~~ REGISTRANT
 - WHERE DO INTERNET
PHARMACKES GET
THEIR PILLS?
DEA? GOV?
 - IF COMPANY MAINTAINS
EFFECTIVE CONTROL, NOT
MUCH TO INSPECT?

RELYING ON STATE INSPECTORS

- DEA ≠ MULT
MILLION DOLLAR
CORP?
- IF COMPANIES
MAINTAIN EFFECTIVE
CONTROL, NOT MUCH
TO INSPECT!

HIPPA : COMPANIES

DON'T HAVE PATIENT MED RX

— THE WHOLE TRUTH :

↳ MANUFACTURERS HAVE
DATA OF THEIR TOP
PRESCRIBERS

↳ COMPANIES CAN
DO THE PED
FLAGS TEST
w/o RXs

METH DOCUMENT &
SUGGESTION THAT ABDC
HAD A "POLICY"
DEA APPROVED OF

- A POLICY IS NO
GOOD IF A COMPANY
DOESN'T FOLLOW IT
- SEATBELT

RE: ABDC AUDITS & PRIVILEGE LOG

^{YOU SAID}
- YOU FOUND COMPANY
WAS "GENERALLY
COMPLIANT?"

- IF YOU ONLY SHOPLIFT
ONCE A MONTH INSTEAD
OF EVERY TIME YOU
ENTER A STORE, THAT'S
STILL AGAINST LAW, RIGHT?

RE: DUTY NOT TO
SHIP

~~REGULATIONS~~
- ~~USA~~ SAYS
REPORT WHEN
DISCOVERED.

c WHEN: @ OR
DURING THAT
TIME

"MCKESSON REACTED
PROMPTLY"

- THEY GOT BUSTED!
- AND DID IT
AGAIN
- COST OF DOING
BUSINESS